Message

From: Ramanauskas, Peter [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6492DDC4240C482B891D9F48B06E17F6-PRAMANAU]
Sent: 4/23/2019 10:00:14 PM
To: Steven Klafka [sklafka@wingraengineering.com]
Subject: RE: Guidance for PCB Sampling under Bike Path

Hello Steve,

Here is a copy of the document you requested.

Regards,
Peter

From: Steven Klafka <sklafka@wingraengineering.com>
Sent: Friday, April 19, 2019 3:49 PM
To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: Re: Guidance for PCB Sampling under Bike Path

Peter,

Thank you for the response on safe gardening levels for PCB's. I will verify that raised beds using imported soil are being used.

Related to the same project, there is reference in recent correspondence to a "U.S. EPA TSCA PCB Coordinated Approval received on April 3, 2019". There is no copy of this EPA approval in the electronic files. Is this a document you can provide me?

Thanks.

Steve Klafka

On 4/17/2019 8:30 AM, Ramanauskas, Peter wrote:

> Hello Steve,
>
> EPA does not have specific published guidance related to PCBs in soil and home gardening. However, EPA has conducted exposure and risk evaluations which apply an uptake factor for transfer of PCBs concentrations from soil into garden vegetables. Those evaluations indicate that soil at PCB concentrations below 2 ppm would not be associated with significant health risk for the typical home gardening scenario. At PCB soil concentrations at or above 10 ppm, home gardening could begin to be associated with health risk that could be a potential concern. That concern would apply more specifically for an individual who consumes garden vegetables grown at the same location for many years (e.g., > 25 years).
>
> It appears from the aerial figure you provided that the gardens in question are raised beds? I would presume these beds were filled with imported soils.
>
> Regards,
> Peter
>
> **From:** Steven Klafka <sklafka@wingraengineering.com>
> **Sent:** Wednesday, April 10, 2019 9:49 AM
> **To:** Ramanauskas, Peter <ramanauskas.peter@epa.gov>
> **Subject:** Guidance for PCB Sampling under Bike Path

Peter,

Thanks for responding to my questions about our PCB investigation.

Related to this cleanup, are you aware of guidance on PCB concentrations in the soil at which food gardening is not recommended? Along the bike path under investigation, the community center has a garden.

Steve Klafka

On 3/27/2019 4:38 PM, Ramanauskas, Peter wrote:

> Hello Steve,
>
> Answers to your questions follow:
>
> 1. Is there EPA guidance on the frequency of sampling along the bike path? Their plan approved by the DNR calls for sampling every 93 feet. Sampling in the soil adjacent to the bike path found orders of magnitude difference just within a few feet.
>
> *The federal regulations provide a characterization guidance under 40 CFR 761 Subpart N; however, it is not mandatory for use. Project Managers are able to use professional judgement related to the adequacy of site characterization based on site specific conditions.*
>
> 2. The bike path is a highly used and is immediately next to the Goodman Center which has outdoor toddler splash pad, pre-school and 4-year old kindergarden. Should the residential RCL of 0.2 ppm be used to determine if soil should be removed rather than the 10 ppm approved by the DNR?
>
> *Under the federal PCB regulations, 10 ppm is an acceptable cleanup level for areas meeting a high-occupancy use if the residual PCB between 1 and 10 ppm is capped and noted within an institutional control for the property.*
>
> Regards,
> Peter
>
> ---
>
> **From:** Steven Klafka <sklafka@wingraengineering.com>
> **Sent:** Wednesday, March 27, 2019 9:40 AM
> **To:** Ramanauskas, Peter <ramanauskas.peter@epa.gov>
> **Subject:** Guidance for PCB Sampling under Bike Path
>
> Peter,
>
> A PCB investigation has been proposed in Madison, Wisconsin. Madison-Kipp will sample beneath approximately 1,300 feet of the bike path that runs along their property. Depending on the PCB concentrations, the bike path will be removed, soil excavated and the path repaved. Soil will be removed if it exceeds 10 ppm. Below are links to the plan, the DNR approval and a map of the project area.
>
> Since this is my neighborhood, I have closely followed the PCB remediation of this industrial property in a residential neighborhood. It would be appreciated if you could address two questions:
>
> 1. Is there EPA guidance on the frequency of sampling along the bike path? Their plan approved by the DNR calls for sampling every 93 feet. Sampling in the soil adjacent to the bike path found

orders of magnitude difference just within a few feet.

2. The bike path is a highly used and is immediately next to the Goodman Center which has outdoor toddler splash pad, pre-school and 4-year old kindergarden. Should the residential RCL of 0.2 ppm be used to determine if soil should be removed rather than the 10 ppm approved by the DNR?

Thanks for your assistance.

Steve Klafka

Links to plan:

https://dnr.wi.gov/botw/DownloadBlobFile.do?docSeqNo=106707&docName=20190320_35_SIWP.pdf
https://dnr.wi.gov/botw/DownloadBlobFile.do?docSeqNo=106893&docName=20190322_36_SIWP_Appr.pdf

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